

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CASE NO. 4:24-CR-00010 HEA

UNITED STATES OF AMERICA

vs.

MOHD AZFAR MALIK, M.D.

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**MOTION FOR TRAVEL
(UNOPPOSED BY THE GOVERNMENT)**

Dr. Mohd Azfar Malik, through undersigned counsel, respectfully requests that the Court allow him to travel to Chicago to visit an ill friend from September 1, 2024, to September 2, 2024. Although the probation office opposes, the government does not oppose this request. Dr. Malik states the following in support of this request:

1. On January 10, 2024, a Grand Jury in the Eastern District of Missouri returned an indictment charging Dr. Malik with one count of conspiracy to distribute controlled substances and maintain a drug-involved premises, in violation of 21 U.S.C. § 846; one count of conspiracy to commit health care fraud, in violation of 18 U.S.C. § 1349; twelve counts of distribution of a controlled substance, in violation of 21 U.S.C. § 841; seven counts of false statements related to health care matters, in violation of 18 U.S.C. § 1035; and one count of maintaining a drug-involved premises, in violation of 21 U.S.C.

§ 856. (DE 2). All of the counts related to Dr. Malik's medical practice and clinic. The magistrate judge recommended that the drug counts be dismissed (DE 86).

2. On January 16, 2024, Dr. Malik self-surrendered to the United States Marshals Service. At Dr. Malik's initial appearance, the Court released him on his own recognizance with travel restricted to the Eastern District of Missouri unless Dr. Malik obtains prior permission from the Court or the Office of Pretrial Services. (DE 9).
3. Because the cancellation of Dr. Malik's prearranged international travel would have caused an undue hardship, the Court permitted Dr. Malik to travel to Mexico to present at a Continuing Medical Education seminar shortly after his arrest. Dr. Malik traveled without issue, returned to the Eastern District of Missouri as directed, and complied with all conditions set by his Pretrial Services Officer.
4. With permission from his previous Pretrial Services Officer, Dr. Malik has traveled within the United States for family matters. On each occasion, Dr. Malik has returned to the Eastern District of Missouri as directed, remained in communication with his Pretrial Services Officer, and complied with all conditions set by his Pretrial Services Officer.
5. Dr. Malik is a 70-year-old medical doctor who resides with his wife of nearly 40 years; she is a practicing neurologist. The Maliks have resided in their home

in Chesterfield for 20 years. They live with Dr. Malik's brother and sister-in-law. Their medical practices and financial assets are in the St. Louis area. Dr. Malik has complied with all the conditions of his pretrial release.

6. Dr. Malik seeks the Court's permission to travel to Chicago, Illinois, on September 1, 2024. Dr. Malik's close friend, Sami Bajwa, is suffering from prostate cancer and is being treated in Chicago. Dr. Malik requests an allowance to drive to Chicago, visit his friend, stay in a hotel for one night, and return to St. Louis on September 2, 2024.
7. Should the Court allow Dr. Malik to travel, he will book his hotel and provide the information to his Pretrial Services Officer. As with his prior travel, Dr. Malik will remain in communication with his Pretrial Services Officer, informing the Officer of his arrival in Chicago and his return to St. Louis.
8. Undersigned counsel conferred with Dr. Malik's new Pretrial Services Officer. Officer Katie Stephens advised undersigned counsel that Pretrial Services will only approve travel for verified work purposes and immediate family needs and Pretrial Services objects to this type of travel.
9. Undersigned counsel conferred with Assistant United States Attorney Amy Sestric. AUSA Sestric has no objection to the one-day travel on behalf of the Government.

For the foregoing reasons, Dr. Malik respectfully requests that the Court allow him to travel to Chicago, Illinois, by car, on September 1, 2024, and return on September 2, 2024.

Respectfully submitted,

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By: /s/ Lauren Field Krasnoff
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